

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SPORTVISION, INC. and SPORTSMEDIA
TECHNOLOGY CORPORATION,

Plaintiffs,

v.

MLB ADVANCED MEDIA L.P.,

Defendant.

Case No. 1:18-CV-03025-PGG

**STIPULATION AND PROPOSED ORDER REGARDING EXTENSION OF
DEADLINES RELATED TO PLAINTIFFS' FIRST AMENDED COMPLAINT**

Plaintiffs Sportvision, Inc. and SportsMEDIA Technology Corporation (collectively the “Plaintiffs”) and Defendant MLB Advanced Media, L.P. (“Defendant”) have conferred by and through their undersigned counsel and, subject to the Court’s approval,

HEREBY STIPULATE AS FOLLOWS:

1. Plaintiffs filed a Complaint (Dkt. 8) against Defendant on or about April 5, 2018.
2. Shortly thereafter, Defendant agreed to waive service of the Complaint.
3. On April 11, 2018, the parties stipulated that, subject to the Court’s approval, Defendant shall answer or otherwise respond to the Complaint by June 11, 2018.
4. On April 16, 2018, the Court approved the parties’ stipulation and entered an order requiring Defendant to answer or otherwise respond to the Complaint by June 11, 2018 (Dkt. 15).
5. On April 27, 2018, Plaintiffs filed their First Amended Complaint (Dkt. 26).
6. Pursuant to Rule 15(a)(3), the deadline for Defendant to answer or otherwise respond to the First Amended Complaint is June 11, 2018. *See* FED. R. CIV. P. 15(a)(3).

7. In the event that Defendant responds to Plaintiffs' First Amended Complaint by filing a motion, Plaintiffs' opposition is due within fourteen days, and Defendant's reply is due within seven days. *See* S.D.N.Y. L.R. 6.1(b).
8. Subject to approval from the Court, the parties have agreed to an extension of time for the following deadlines related to Plaintiffs' First Amended Complaint:
 - a. Deadline for Defendant to answer or otherwise respond to First Amended Complaint: **June 27, 2018**. (This request represents an extension of 16 days beyond the current deadline.)
 - b. Deadline for Plaintiffs to file an opposition to any motion filed in response to First Amended Complaint: **July 25, 2018**. (This request represents an extension of 14 days beyond the time to respond provided in the S.D.N.Y. Local Rules.)
 - c. Deadline for Defendant to file a reply in support of any motion filed in response to First Amended Complaint: **August 8, 2018**. (This request represents an extension of 7 days beyond the time to respond provided in the S.D.N.Y. Local Rules.)
9. The parties have not previously requested an extension of the deadlines related to Plaintiffs' First Amended Complaint.
10. The parties seek this extension of time in good faith in order to enable them to fully and adequately address the complex issues involved in this case and to account for an unrelated previously scheduled arbitration involving Plaintiffs' counsel.
11. The parties do not seek this extension for an improper purpose.
12. This proposed extension will not affect any other deadlines in this case.
13. All parties to this action consent to the proposed extension.

14. The parties agree that, by authorizing its counsel to waive service on its behalf, Defendant has not waived any defense other than insufficient process and insufficient service of process under Federal Rules of Civil Procedure 12(b)(4) and (5).
15. The parties agree that this stipulation is not a waiver of any defenses unrelated to service of process, including, without limitation, any jurisdictional defenses under Federal Rule of Civil Procedure 12(b)(2).

/s/ Alan Littmann

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Counsel for Plaintiffs

Dated: _____

United States District Judge

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served on May 3, 2018, by ECF to all counsel of record who are deemed to have consented to electronic service.

/s/ Alan E. Littmann

Alan E. Littmann